



in accordance with LR 56.5, and comply with the requirements of LR 7.2. In accordance with LR 56.6, Plaintiff will also file an Appendix.

**REQUESTED RELIEF**

4. Plaintiffs respectfully ask the Court to enter an order granting this Motion for Partial Summary Judgment, and requests the following relief against Defendant, their agents, servants, employees, attorneys, and all persons and entities in active concert or participation with them, directly or indirectly:

- a. A declaratory judgment that the Challenged Laws violate the First, Fourth, and Fourteenth Amendment;
- b. A declaratory judgment holding that any arrests and detention made pursuant to the Challenged Laws was an unlawful violation of 42 U.S.C. § 1983; and
- c. A permanent injunction prohibiting the City from enforcing the Challenged Laws hereby submit this Application for Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65 and the Local Civil Rules of the Northern District of Texas.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request the Court grant this their Motion for Summary Judgment and enter a preliminary injunction in substantial conformity with the Proposed Order attached hereto, and for any such further relief at law or in equity to which they may be entitled.

Dated: August 26, 2019.

Respectfully submitted,

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**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on August 26, 2019 a true and correct copy of the foregoing application and supporting documents were served on Defendant's counsel of record via ECF in accordance Federal Rules of Civil Procedure.

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